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Defendant.

# JOINT DISCOVERY AGREEMENT

## Statement of Intent

A 4x3 grid of dots, consisting of 12 dots arranged in 4 rows and 3 columns.

**Discovery Schedule**

A. No later than **10 days** after defendant's arraignment, the government will disclose:

1. All statements, documents, and objects, including audio or video recordings, required to be disclosed under Rules 16(a)(1)(A)-(F), Federal Rules of Criminal Procedure.
2. All search warrants, orders authorizing the interception of wire, oral or electronic communications, and supporting affidavits, that relate to evidence that may be offered at trial.
3. All police or investigative reports that relate to the charges in the Indictment, except for reports, memoranda, or other internal government documents that relate to interviews of prospective witnesses.

B. No later than **45 days** after arraignment and plea the government will disclose any reports or memoranda of interviews of witnesses the government intends to call in its case in chief.

C. No later than **30 days** before trial:

1. All parties will provide expert disclosures as required under Rules 16(a)(1)(G) and (b)(1)(C), Federal Rules of Criminal Procedure.
2. Defendant will disclose all documents, objects, and reports of examination required under Rules 16(b)(1)(A) and (B), Federal Rules of Criminal Procedure.
3. Defendant will provide notice of any defenses under Rule 12.1, Federal Rules of Criminal Procedure.

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1 D. No later than **10 days** before trial:

- 2 1. The parties will disclose any summaries, charts, or calculations, that will be  
3 offered at trial.
- 4 2. The parties will identify recordings, transcripts of recordings, or portions  
5 thereof, that will be offered at trial.
- 6 3. The government will disclose any statements of witnesses under Title 18,  
7 United States Code, Section 3500.
- 8 4. The defendant will disclose any statements of witnesses the defendant intends  
9 to call at trial.

10 E. Any party withholding the disclosure of items subject to this agreement will provide notice to  
11 the other party of the intent to withhold disclosure and describe the nature of the item and the  
12 basis for withholding disclosure.

13 **Limitations**

14 The parties agree that the disclosure deadlines set forth above apply to those objects,  
15 documents, items, and other disclosure matters that are in the possession, custody, or control of the  
16 parties at the time the obligation to disclose arises. Nothing in this agreement is intended to relieve  
17 either party of the continuing duty to provide disclosures up to and through trial as to any matters  
18 required to be disclosed by statute, rule, or the United States Constitution. Further, nothing in this  
19 agreement is intended to limit, or in any way affect, the determination of admissibility of evidence at  
20 trial or otherwise restrict or expand the remedies available to the Court for any breach of disclosure  
21 obligations as set forth in Rule 16(d).

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DATED this 4<sup>th</sup> day of JANUARY, 2012 ~~December, 2011~~.

  
PHILLIP N. SMITH, JR.  
Assistant United States Attorney

UNITED STATES MAGISTRATE JUDGE  
DATED: January 5, 2012